

## REMARKS/ARGUMENTS

Prior to this Amendment, claims 1-20 and 22 were pending in the application. Claims 23 and 24 are added to provide protection for features not shown by the cited references. Support is found at least at page 14, lines 8-31 of the specification. No new matter is added. Claims 1-20 and 22-24 remain for consideration by the Examiner.

### **Rejections Under 35 U.S.C. § 103 of Claims 1-5**

In the Office Action, claims 1-5 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,327,590 (“Chidlovskii”) in view of U.S. Patent No. 6,366,915 (“Rubert”). The rejection of the claims based on the combination of these references is respectfully traversed based on the following remarks.

Claim 1 is directed to a method for controlling access provided to a client to content files. The method comprises “creating a modified search request by applying a search profile for the client to the received search request” and “wherein the applying of the search profile includes adding at least a portion of the search profile to the received request to specify a set of the search engine collections to be searched by the search engine with the modified search request.” Each of these limitations is not taught or suggested by the combination of Chidlovskii and Rubert, and hence, claim 1 is not made obvious by these references.

In the Office Action on page 5, it was stated that “Chidlovskii does not disclose wherein the applying of the search profile includes adding at least a portion of the search profile to the received search request to specify a set of the search engine collections to be searched by the search engine with the modified search request.” In the Response to Arguments on line 2 of page 3, the Office Action states that “Rubert also teaches determining which databases to search according to the user information.” However, Rubert is cited at Figure 4, 410, col. 2, lines 61-64, and Rubert at this citation and elsewhere fails to teach the limitation of claim 1 of “adding at least a portion of the search profile to the received request to specify a set of the search engine collections to be searched by the search engine.” Combining the teachings of these two references would not result in the claimed invention, and hence, claim 1 is allowable over Chidlovskii and Rubert.

Specifically, Rubert at Figure 4 item 410, is teaching a step of receiving notification of a user identity but not of adding a portion of a profile to a search request to set which

databases can be accessed by the user. Instead, turning to col. 2, lines 61-66, Rubert teaches a system using a user's identification to identify which databases can be accessed by the user and which queries can be executed. The Rubert system then "presents the user with available queries" and the user must select one of the queries, and the user must actively select which queries (or forms, reports, and the like) they wish to receive.

Nothing in Rubert explicitly or implicitly suggests that the user is submitting a search request that is modified by adding something from the profile, but instead, the profile is used to identify the databases and how they may be queried – these are different processes. This can be seen at various locations in Rubert such as: (1) col. 4, line 3, "provides an interface with which the user can easily specify a query"; (2) col. 4, line 40, "the IR system then presents the user with these queries"; (3) col. 4, line 55, "After the user has finished specifying the query, the IR system then executes the query"; and (4) col. 5, line 53, "authorized report forms for Bob are shown in UI screen 100." Rubert's teachings when applied in the context of Applicant's invention would suggest to one skilled in the art that access to the content files 150 is requested and in response sets of the content files 150 are offered to the requestor along with a set of acceptable queries. Instead, the invention of Claim 1 calls for allowing the user to define the search request as a free search but then, a portion of a profile is added to define which search engine collections are accessed. Rubert's teaching when combined with the teaching of Chidlovskii would not successfully lead to the claimed invention. Therefore, Claim 1 is non-obvious and allowable over Chidlovskii in view of Rubert.

The Response to Arguments portion of the Office Action further asserts that Chidlovskii teaches creating a modified search request with its language regarding applying a predetermined context profile to the search query "to generate a context of the search query." The Office Action then argues that this "context" is used to determine the community or set of communities to search. However, Chidlovskii in Figure 2 only shows one community document collection 70 and several search engines 20, and at col. 2, lines 33-50 indicates that terms of the search query are compared to the user's context profile to determine a context but then the search engine(s) are "responsive to the search query" to generate search results. There is no teaching that anything from the context profile is added to the search query or that the search query is modified in any way prior to its use by the search engines. Instead, the

“context” is used later by the post-processor 40 to rank items returned by the search engine based on “the” search query (see, col. 2, lines 55-64). Chidlovskii teaches a method of processing results of a search but not how to control access to search engine collections (which, in fact, are not discussed in Chidlovskii, which indicates that the search query originally submitted to the user is applied to all of the search engine collections). Hence, Chidlovskii does not teach or suggest the invention of claim 1.

New claims 23 and 24 depend from claim 1 and are added to protect additional features of the invention not shown by Chidlovskii and Rubert. Claim 23 calls for the modified search request to comprise the received search request and the portion of the search profile included as an add on restriction. Claim 24 further calls for the add on restriction to be a tag label of one of the search engine collections. These limitations are not shown or suggested by Chidlovskii and Rubert.

Claims 2-5 depend from claim 1 and are believed allowable as depending from an allowable base claim.

#### **Rejections Under 35 U.S.C. § 103 of Claim 6**

In the Office Action, claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Chidlovskii in view of Rubert further in view of U.S. Patent No. 6,360,215 (“Judd”). The rejection of the claim 6 based on the combination of these references is respectfully traversed based on the following remarks.

Claim 6 depends from claim 1 and further calls for “prior to the receiving of the search request, intercepting an indexing request from the search engine for a set of information from the content for the search engine collections and in response, returning to the search engine a modified form of the requested set of information.” The method, hence, restricts a search engine’s building of its search collections, which are later used by the search engine for responding to a search request from a client, e.g., the search engine does not typically directly search the content but instead searches the indexed collections.

The Office Action at page 6, states that Chidlovskii and Rubert do not disclose “prior to the receiving of the search request, intercepting an indexing request from the search engine for a set of information from the content for the search engine collections and in response, returning to the search engine a modified form of the requested set of information” and then

argues that Judd teaches this limitation at Figure 1. However, in the Response to Arguments, the Office Action cites Chidlovskii with the identical citation used for claim 1 and no further discussion of Judd is provided in the Response to Arguments. As discussed with respect to claim 1, Chidlovskii provides no teaching of building and using search engine collections, and particularly, search engine collections that are limited by returning a modified forms of requested sets of information to search engine indexing requests. Therefore, Chidlovskii fails to teach the limitation of claim 6, and this is consistent with the Office Action statement on page 6.

Further, the Office Action of April 11, 2003 failed to address Applicant's remarks distinguishing Judd from claim 6. Hence, Applicant respectfully requests that the Office carefully consider and respond to the following arguments distinguishing Judd from claim 6 that have been provided in the last two responses:

After reviewing Judd at Fig. 1 and at col. 5., line 62 to col. 8, line 29 where Fig. 1 is described, Applicant could find no teaching or suggestion that it may be desirable to intercept a search engine indexing or populating request by retrieving the requested data from a content store but yet returning a modified version of the retrieved data. This is useful for controlling how the search engine collections is populated (i.e., limiting access to content by the search engines), and thus, limiting access by clients who later submit search requests as the collection is different than the raw information in the content store. Claim 6 is believed allowable for this additional reason over the combination of Chidlovskii, Rubert, and Judd.

#### **Rejections Under 35 U.S.C. § 103 of Claims 7-13**

Additionally, in the Office Action, Claims 7-13 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,253,198 ("Perkins") in view of Rubert. This rejection is respectfully traversed based on the following remarks.

In the Response to Arguments, the Office Action states that it is well known in the art that the software program has an API and that it is needed to communicate with a software program. However, the Response to Arguments does not point to Perkins or Rubert to show that an interface is positioned between a search engine and a set of content files or that such an interface would be used to limit what content or how content is indexed in the search

engines collections. Applicant traverses taking of what appears to be Official Notice of this feature of the claimed invention. In the Applicant's specification beginning at page 2, line 20, Applicant makes it clear that search engines are typically provided direct access to content files for use in building indexed collections for use in responding to client search requests. The Office Action's assertion that placing a restrictive interface between content files and a search engine even an API is known in the art directly contradicts Applicant's knowledge of the state of the art at the time the application was filed.

Further, independent Claim 7 is directed to a method for restricting access to content files by a search engine that calls for "positioning a search engine interface between the client and the search engine, wherein the search engine interface is also positioned between the search engine and the content files." The search engine interface then receives "an indexing request from the search engine for a set of information from the content files." Significantly, the method further includes the two steps of "operating the search engine interface to retrieve the set of information from the content files" and then "**modifying content in the set of information with the search engine interface.**" Hence, the method of Claim 7 requires that the search engine interface act as a intermediary between the search engine and the content files (no direct access provided as was the case in prior art systems) and is then able to control what "content" is returned to the search engine for use in "populating a search engine collections." Because all of these features are not shown or even suggested by the combination of Perkins and Rubert, independent Claim 7 is non-obvious based on these references.

In the Office Action, Perkins is cited at col., 1, lines 59-61 and col. 6, lines 1-3 for teaching positioning a search interface between a search engine and content files. However, Perkins teaches providing a standard interface such as a Common Gateway Interface (CGI) **between the client (which sends the "query") and the search engine but not an interface between the search engine and the content files.** Note, the "search engine database" described at col. 6, lines 1-3 is a search engine collections so this citation also discusses a CGI between a client and a search engine used for allowing a user to add to, modify, or delete information in the search engine collections (but not for controlling interactions between a search engine and content files used to populate the collections). Hence, the positioning step of Claim 7 is not shown or suggested.

Perkins is cited at col. 10, lines 27-67 for teaching operating the search engine interface to retrieve the set of information from the content files. However, at this point, Perkins is discussing how to update the search engine database and search engine index using a CGI program (i.e., which was **positioned between the client and the search engine**). There is no teaching that the search engine when populating its collections or database would go through a search engine interface that would retrieve information identified in an indexing request from content files (typically in a manner that is transparent to the search engine)."

The Office Action notes that **Perkins does not teach modifying content** in the retrieved set of information with the search interface engine but cites Rubert at Figs. 6A-6B, 610, 615 (instead of the Christensen reference). Rubert provides no teaching of modifying data retrieved from a content source prior to placing it in the search engine collections, and hence, there would be no motivation to modify Perkins to arrive at the invention of Claim 7. More particularly, Rubert in the method shown in Figures 6A and 6B is discussing query execution and presenting report forms and query selections from a user (see items 610 and 615 in particular). Rubert does not discuss the populating of databases served by database servers 350, 352, 354 with an intermediary device like the search interface engine. Instead, Rubert teaches controlling access to the databases after they are created by only allowing certain queries to be selected by a user (which would be more like controlling access to the search engine collections rather than the search engine to the content). The claimed invention in contrast provides protection of content in files 150 of Figure 1 by limiting what a search engine can access in creating search engine collections 166. This is a very different tactic in providing limited user access – in the claimed invention, **some data is not even made available to the searching tool** (such as the IR system 300 of Figure 3 in Rubert). For at least this reason, Claim 7 is believed allowable over the combination of Perkins and Rubert.

Claims 8-13 depend from independent Claim 7 and are believed allowable for the reasons for allowing Claim 7. Further, Claim 11 calls for modifying the search request by operating the search engine interface in a fashion similar to that described in Claim 1 to add a client search profile to a received search request to identify which portions of a search engine collections to apply the modified search request. Hence, Claim 11, and Claim 12 that depends from Claim 11, is allowable over these combined references for the additional reasons provided for allowing Claim 1.

**Rejections Under 35 U.S.C. § 103 of Claim 14-20**

Additionally, in the Office Action, Claims 14-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Judd in view of Rubert. This rejection is respectfully traversed based on the following remarks.

Independent Claim 14 is directed to a web server with limitations similar to those of Claim 1 written in apparatus form. Hence, Claim 14 and Claims 15-17 that depend from Claim 14 are believed allowable at least for the reasons for allowing Claim 1.

Independent Claim 18 as amended includes limitations similar to that of the method of Claim 7 written in computer program and code devices language. Therefore, the reasons provided for allowing Claim 7 are applicable to Claim 18. Particularly, the computer program of Claim 18 includes code devices for creating a modified search request by applying a search profile, which is not shown by Judd or Rubert. Further, the computer program includes code devices for intercepting an index request from the search engine and generating a restricted populating set of information by modifying the results of the indexing request. The search engine then uses this restricted set to populate the search engine collections. Rubert provides no teaching of limiting the population of its databases but instead limits a user's ability to query such databases. Hence, Claim 18 is believed allowable as non-obvious in light of Judd and Rubert. Claims 19 and 20 depend from Claim 18 and are believed allowable for the reasons for allowing Claim 18.

More particularly, the Response to Arguments section of the Office Action states that Rubert teaches modifying a search request by limiting the search request to which database can be accessed by the user and since the query is restricted, "of course the search result will have a restricted population from restricted database." But, as discussed with regard to claim 1, Rubert teaches a system using a user's identification to identify which databases can be accessed by the user and which queries can be executed. The Rubert system then "presents the user with available queries" and the user must select one of the queries, and the user must actively select which queries (or forms, reports, and the like) they wish to receive. Nothing in Rubert explicitly or implicitly suggests that the user is submitting a search request that is modified by adding something from the profile, but instead, the profile is used to identify the databases and how they may be queried – **these are different processes**.

### **Rejections Under 35 U.S.C. § 103 of Claim 22**

Additionally, in the Office Action, Claim 22 was rejected under 35 U.S.C. §103(a) as being unpatentable over Chidlovskii taken alone. This rejection is respectfully traversed based on the following remarks.

Claim 22 includes a combination of limitations of claims 1 and 7. The Office Action requires the combination of Rubert and Chidlovskii to reject claim 1 and the combination of Perkins and Rubert to reject claim 7. It is unclear how Chidlovskii could be used alone to reject a claim that includes limitations of both claims. However, Applicant believes that even if Chidlovskii, Rubert, and Perkins were combined, claim 22 would be allowable for the reasons provided for allowing claims 1 and 7.

In the Office Action, Chidlovskii is cited at Figures 1-2, col. 2, lines 49 to col. 3, line 6 for teaching all the elements of Claim 22 except to selecting a set of search engine collections based on a service identification added to a search request. This step is said to be obvious based on knowledge of those skilled in the art with the teaching of Chidlovskii. First, though, Chidlovskii fails to teach several of the elements of Claim 22. Claim 22 calls for “modifying the retrieved set of information with the search interface to include service identifications.” Chidlovskii fails to teach the concept of populating the search engine collections with modifications to include service identifications (and beginning at col. 2, line 49 discusses what occurs after a search request is received – i.e., after the point at which a search engine collection would be populated). Additionally, Applicant does not agree that it would be obvious to modify Chidlovskii to modify search requests to limit/filter which search engine collections may be searched based on a client search profile. As discussed with reference to Claim 1, Chidlovskii does not teach modifying the search profile so it would not be obvious to add a modification step to the teachings of Chidlovskii and, particularly, the modification step called for in Claim 22 useful for filtering which information is accessible by a user based on their profile. Because Chidlovskii fails to suggest at least these two elements, Claim 22 is believed in condition for allowance.

The Response to Arguments asserts “Chidlovskii teaches modifying search request to limit which community is appropriate to the search.” However, no citation is provided and at col. 2, lines 33-64, Chidlovskii teaches creating a context for a search by “comparing the terms in the search query with a predetermined user context profile.” The “search query” is

then used by the search engine in performing the search, with no discussion of modification, and the “context” is used by the post-processor in determining results ranking. There is no discussion of limiting access to the community documents or that the search engines are blocked from freely accessing the community documents to build their indexed collections

### **Conclusions**

Newly cited but not relied upon references (i.e., U.S. Patent No. 6,374,237 (“Reese”) and U.S. Patent No. 6,484,164 (“Nikolovska”)) have been considered but do not overcome the deficiencies of the references relied upon in the Office Action. The pending claims are believed allowable over these additional references taken alone or in combination with the other cited references.

A check is provided for the fees associated with the added claims. Any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

It is respectfully requested that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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